

DANIEL G. BOGDEN  
United States Attorney  
District of Nevada  
BLAINE T. WELSH  
Assistant United States Attorney  
Nevada Bar. No. 4790  
333 Las Vegas Blvd. South, Suite 5000  
Las Vegas, Nevada 89101  
Phone: (702) 388-6336  
Facsimile: (702) 388-6787  
Email: Blaine.Welsh@usdoj.gov

JONATHAN NUECHTERLEIN  
General Counsel  
NIKHIL SINGHVI  
JASON D. SCHALL  
HELEN P. WONG  
IOANA RUSU  
LaSHAWN M. JOHNSON  
COURTNEY A. ESTEP  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Mailstop CC-10232  
Washington, D.C. 20580  
Phone: (202) 326-3480 (Singhvi)  
Facsimile: (202) 326-3768  
Email: [nsinghvi@ftc.gov](mailto:nsinghvi@ftc.gov) (Singhvi); [jschall@ftc.gov](mailto:jschall@ftc.gov) (Schall)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMG Services, Inc. et al.,

Defendants, and

Park 269 LLC, et al.,

Relief Defendants.

Case No. 2:12-cv-536-GMN-VCF

**STIPULATION AND  
PROPOSED ORDER TO  
STAY CASE AS TO TROY  
LITTLEAXE, JR.**

1 Pursuant to L.R. 7-1, Plaintiff Federal Trade Commission (“FTC”) and Defendant Troy  
2 LittleAxe, Jr. (“Defendant LittleAxe”) hereby stipulate to stay all proceedings and deadlines in  
3 this case as to the Defendant LittleAxe. In support of this stipulation, the FTC and Defendant  
4 LittleAxe state as follows:

5 1. FTC counsel and Defendant LittleAxe have reached possible resolution of this  
6 matter against Defendant LittleAxe which would resolve the current proceedings against him via  
7 a proposed stipulated order for permanent injunctive relief.

8 2. The FTC is an independent federal agency. All settlements recommended by  
9 FTC counsel must be voted on by the full Commission. The process may take several weeks or  
10 more. If the Commission approves the proposed stipulated order for permanent injunction, the  
11 FTC will submit a motion and the proposed order to the Court for approval.

12 3. Any continued proceedings as to Defendant LittleAxe while the Commission is  
13 conducting its approval process would, therefore, constitute a waste of judicial time and  
14 resources, as well as those of the undersigned parties.

15 4. This stipulation and the relief requested apply only to Defendant LittleAxe.

16 \

17 \

18 \

19 \

20 \

21 \

22 \

23 \

24 \

25 \

26 \

27 \

1 WHEREFORE, the FTC and Troy LittleAxe, Jr. jointly request an indefinite stay of all  
2 proceedings in this matter as to Troy LittleAxe, Jr., as well as all deadlines imposed by the  
3 Federal Rules of Civil Procedure, and the Local Rules of the United States District Court for the  
4 District of Nevada.

5 Dated: September 24, 2014

6  
7 */s/ Nikhil Singhvi*

8 \_\_\_\_\_  
9 Nikhil Singhvi  
10 Federal Trade Commission  
11 600 Pennsylvania Ave., NW  
12 Mail Stop: CC-10232  
Washington, DC 20580  
Telephone: (202) 326-3480  
Facsimile: (202) 326-3768  
Email: nsinghvi@ftc.gov

13 *Attorney for Plaintiff*  
14 *Federal Trade Commission*

*/s/ Paul C. Ray*

\_\_\_\_\_   
PAUL C. RAY  
PAUL C. RAY, CHTD.  
8670 West Cheyenne Avenue  
Suite 120  
Las Vegas, NV 89129  
Telephone: (702) 823-2292  
Facsimile: (702) 823-2384  
Email: paulcraylaw@gmail.com

*Attorney for Defendant Troy L.  
LittleAxe Jr.*

15  
16  
17 **ORDER**

18 IT IS SO ORDERED:

19  
20 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

21 Dated: \_\_\_\_\_  
22  
23  
24  
25  
26  
27

**CERTIFICATE OF SERVICE**

I, Nikhil Singhvi, certify that, as indicated below, all parties were served with the **STIPULATION AND PROPOSED ORDER TO STAY CASE AS TO TROY LITTLEAXE, JR.** filed with the Court, as indicated below.

Dated: September 24, 2014

/s/ Nikhil Singhvi  
Nikhil Singhvi

**Via Electronic Case Filing:**

Joshua M. Dickey (jdickey@baileykennedy.com)

*Attorney for Red Cedar Services, Inc. dba 500FastCash; SFS, Inc. dba OneClickCash*

Conly J. Schulte (cschulte@ndnlaw.com)

Francis J. Nyhan (jnyhan@ndnlaw.com)

Nicole Ducheneaux (nducheneaux@ndnlaw.com)

*Attorneys for Defendants AMG Services, Inc.; Red Cedar Services, Inc. dba 500FastCash; SFS, Inc. dba OneClickCash; MNE Services, Inc. dba Tribal Financial Services, Ameriloan, UnitedCashLoans, USFastCash*

David J. Merrill (david@djmerrillpc.com)

Debra K. Lefler (debra.lefler@kirkland.com)

Bradley Weidenhammer (bweidenhammer@kirkland.com)

Charles Kalil (ckalil@kirkland.com)

Richard Howell (rhowell@kirkland.com)

Peter J. Wozniak (peter.wozniak@kirkland.com)

Andrew A. Kassof (andrew.kassof@kirkland.com)

*Attorneys for Defendants AMG Services, Inc. and MNE Services, Inc. dba Tribal Financial Services, Ameriloan, UnitedCashLoans, USFastCash*

Von S. Heinz (vheinz@lrrlaw.com)

Darren J. Lemieux (dlemieux@lrrlaw.com)

E. Leif Reid (lreid@lrrlaw.com)

Jeffrey D. Morris (jmorris@berkowitzoliver.com)

Ryan C. Hudson (rhudson@berkowitzoliver.com)

Nick J. Kurt (nkurt@berkowitzoliver.com)

*Attorneys for Defendants AMG Capital Management, LLC; Level 5 Motorsports, LLC; LeadFlash Consulting, LLC; Black Creek Capital Corporation; Broadmoor Capital Partners, LLC; Scott A. Tucker; Nereyda M. Tucker, as Executor of the Estate of Blaine A. Tucker*

1 Jay Young (jay@h2law.com)  
Attorney for Defendant for Robert D. Campbell

2 Paul C. Ray (paulcraylaw@aol.com)  
3 Alyssa D. Campbell (acampbell@laic-law.com)  
Attorneys for Defendant Troy L. LittleAxe

4 Patrick J. Reilly (preilly@hollandhart.com)  
5 Linda C. McFee (lmcfee@mcdowellrice.com)  
6 Robert Peter Smith (petesmith@mcdowellrice.com)  
Attorneys for Relief Defendants Kim C. Tucker and Park 269 LLC

7 Brian R. Reeve (breeve@swlaw.com)  
8 Nathan F. Garrett (ngarrett@gravesgarrett.com)  
9 Whitney P. Strack (pstrack@gravesgarrett.com)  
Attorneys for Defendant Don E. Brady